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February 11, 2022

Via ECF Only

Katharine H. Parker
United States Magistrate Judge
U.S. District Court 500 Pearl Street, Room 750
New York, NY 10007

Re: *Graham Chase Robinson v. Canal Prods., Inc. et al.*
Civil Action No.: 19cv9156 (LTS) (KHP)

Dear Judge Parker:

This firm represents all Defendants in the captioned action, and Tarter Krinsky & Drogin LLP represents Defendant Canal Productions, Inc. (“Canal”) as co-counsel (collectively, “Defendants”). In light of the Court’s January 31, 2022 Order (ECF #154) directing that discovery must be completed by today, we write to inform the Court of a potential dispute which Defendants may petition the Court to adjudicate next week.

Briefly stated, Plaintiff testified that she retained the nonprofit organization Neighborhood Defender Service, Inc. d/b/a Neighborhood Defender Service of Harlem (“NDS”) to represent her in connection with an investigation initiated by the New York District Attorney’s Office after she resigned from Canal. Defendants served a Subpoena Duces Tecum on non-party NDS seeking documents relating to NDS’ mission, the services it offers and its representation of the Plaintiff (the “Subpoena”). Through counsel, NDS served its objections and responses to the Subpoena on February 8. During a meet-and-confer this morning, NDS’ counsel represented that they would provide certain limited, but not all, documents sought by the Subpoena. Consistent with the Local Rules and Your Honor’s Individual Practices in Civil Cases, Defendants will evaluate the documents NDS’ counsel produces in response to the Subpoena, and will otherwise engage in good faith with counsel to determine if any dispute arising out of the Subpoena can be resolved without Court intervention. Absent resolution, Defendants may pursue a motion to compel proper compliance with the Subpoena.

Please contact us if the Court has any questions.

Respectfully submitted,

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP

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cc: All Counsel (via ECF only)

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